

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: APPLICATION OF)
FORBES MEDIA LLC) MISC. NO. 21-52
AND THOMAS BREWSTER)
TO UNSEAL RECORDS)

**GOVERNMENT'S MOTION FOR LEAVE
TO FILE A RESPONSE UNDER SEAL**

The United States of America, by its attorneys, Scott W. Brady, United States Attorney for the Western District of Pennsylvania, and Shardul S. Desai, Assistant United States Attorney in and for said District, respectfully files this Motion for Leave to File the Government Response in Opposition under seal. The government avers as follows:

1. The Petitioners seek the disclosure of records that are under seal. In support thereof, Petitioner relies on records obtained from a San Diego matters, which is currently under seal but which had been inadvertently unsealed by a clerk of court.

2. In order to effectively respond to Petitioners motion, a small portion of the government's Response needs to address the type of records that may potentially be under seal. Without filing its Response under seal, the government would be forced to publicly disclose potentially under seal matters in order to protect such matters from disclosure. Therefore, in the interest of justice, it would be prudent that the Government's Response be filed under seal. The Government will file a redacted version of the Government's Response on the public docket.

3. Moreover, the Petitioners and their counsel should be precluded from disclosing, publicizing, disseminating, distributing, and/or sharing any information that is under seal in this matter.

WHEREFORE, the United States respectfully requests that this Court to grant leave to file the Government Response under seal and to preclude Petitioners and their counsel from disclosing, publicizing, disseminating, distributing, and/or sharing any information that is under seal in this matter without leave of the court.

Respectfully submitted,

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